

1 John A. Vogt (State Bar No. 198677)  
2 javogt@jonesday.com  
3 Edward S. Chang (State Bar No. 241682)  
4 echang@jonesday.com  
5 JONES DAY  
6 3161 Michelson Drive, Suite 800  
7 Irvine, California 92612  
8 Telephone: (949) 851-3939  
9 Facsimile: (949) 553-7539

10 Attorneys for Defendant  
11 INTELIUS INC.

12 UNITED STATES DISTRICT COURT  
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA  
14 SOUTHERN DIVISION

15 LISA LIBERI, et al.,  
16 Plaintiffs,  
17 v.  
18 ORLY TAITZ, et al.,  
19 Defendants.

Case No. 8:11-CV-00485-AG (AJWx)

Assigned for all purposes to  
Honorable Andrew J. Guilford

**DEFENDANT INTELIUS INC.'S  
NOTICE OF JOINDER AND  
JOINDER IN THE REED  
DEFENDANTS' MOTION TO  
DISMISS**

Date: October 17, 2011  
Time: 10:00 a.m.  
Dept: 10 D

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

**PLEASE TAKE NOTICE** that, Defendant Intelius Inc. ("Intelius") hereby  
joins in the Motion to Dismiss filed in the above-captioned matter by Defendants  
Reed Elsevier, Inc., LexisNexis Risk and Information Analytics Group, Inc.,

1 LexisNexis, Inc., LexisNexis Risk Solutions, Inc., LexisNexis ChoicePoint, Inc.,  
2 LexisNexis Seisint, Inc., d/b/a/ Accurint, and LexisNexis Group, Inc. (collectively,  
3 the “Reed Defendants”). Intelius joins the Reed Defendants’ Motion to Dismiss on  
4 the same grounds as those set forth in the Reed Defendants’ Memorandum of  
5 Points and Authorities in support of its Motion to Dismiss. Because Plaintiffs have  
6 failed to allege facts sufficient to state a cause of action and, because they cannot do  
7 so through amendment, the First Amended Complaint should be dismissed with  
8 prejudice in its entirety as to both Intelius and the Reed Defendants for substantially  
9 the same reasons.

10 This Joinder is based upon this Notice of Joinder and Joinder, the Reed  
11 Defendants’ Notice of Motion and Motion to Dismiss, the Memorandum of Points  
12 and Authorities filed concurrently therewith, all pleadings, papers and other  
13 documents on file with this Court, and such further material or argument as the  
14 Court may consider at or before the hearings on the Motion to Dismiss.

15 Dated: October 3, 2011

Respectfully submitted,

JONES DAY

18  
19 By: /s/ John A. Vogt  
John A. Vogt

20 Attorneys for Defendant  
21 INTELIOUS INC.  
22  
23  
24  
25  
26  
27  
28